

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: **JAMES F. YUNKMAN**

Case Number: 21-45937-TJT
Chapter 13
Judge TUCKER

Debtor.

WILLIAM D. JOHNSON (P54823)
ACCLAIM LEGAL SERVICES, P.L.L.C.
8900 E. 13 Mile Rd.
Warren, MI 48093
(248) 443-7033

Debtor's Chapter 13 Confirmation Hearing Certificate

At the next confirmation hearing in this case, the debtor intends to: (check ONE of the following)

1. X Request confirmation of the debtor's plan, even through all timely objections have not been resolved. I have e-mailed to the Trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order. The parties are at an impasse in attempting to resolve these objections despite all reasonable efforts. The following are: (a.) the parties whose timely objections have not been resolved; (b) their unresolved objections; and (c) the legal and factual issues that must be resolved by the Court in connection with confirmation:

Outstanding Trustee Objections:

Trustee Objections:	<ol style="list-style-type: none">1. The Trustee objects to the failure to provide for a step increase upon completion of the Debtor's obligation to UMCU.2. The Trustee objects on the grounds that the Chapter 13 Plan proposes to pay less than the liquidation analysis.
Debtor's Response:	<ol style="list-style-type: none">1. The Debtor is proposing to pay all claims in full. Debtor requests that the Trustee withdraw this objection.2. The Debtor is proposing to pay all claims in full. Debtor requests that the Trustee withdraw this objection.

/s/ Ryan A. Paree
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